

EXHIBIT F

Seal v. Harrison County, Mississippi, by and through its Board of Supervisors, et al
Videotaped deposition of: Morgan Lee Thompson

August 14, 2009

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

Southern Division

WILLIAM DAVID SEAL,

*

Plaintiff,

*

v.

*

Civil Action No.

HARRISON COUNTY, MISSISSIPPI *

1:08CV175-LG-RHW

BY AND THROUGH ITS BOARD OF *

SUPERVISORS, et al., *

Defendants. *

COPY

VIDEO-RECORDED DEPOSITION OF

MORGAN THOMPSON

August 14, 2009

11:06 a.m. - 11:35 a.m.

Hopewell, Virginia

REPORTED BY: Kurt D. Hruneni, CCR-VA

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1 MR. BUCHANAN: Not if he has questions.

2 MR. BRENDDEL: I have a few questions.

3 MR. GEWIN: Okay.

4

5 BY MR. BRENDDEL:

6 Q Mr. Thompson, I have a few questions about
7 the Seal incident. Let's first start off with the date

8 it occurred -- I think we've already talked about it --
9 September 4th, 2005.

10 Katrina was on, I think, August 29th, 2005;
11 right?

12 A Yes, sir.

13 Q So we're talking about a week after Katrina
14 at the jail; correct? When this incident happened?

15 A Yes, sir.

16 Q I know you kind of touched on this earlier.
17 But just so everyone gets a real good understanding,
18 let's talk about September 4th, 2005.

19 Just describe generally what the conditions
20 were like in booking at the jail as of September 4,
21 2005.

22 A I don't remember if we were still running
23 on generator power or not. But real humid, dank,
24 nasty. Pretty much, the whole town around was, you
25 know, screwed up. Everything from the train tracks

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1 down to the beach was destroyed.

2 And there were still a lot of people taking
3 advantage of the smaller guys. You know, still a lot
4 of people out there stealing gas from people's
5 generators. You know, little mobile tents sent up for
6 daycare; people were stealing generators from them.

7 And there were just a lot of shitty things
8 happening. And the jail was still way overpopulated,
9 still packed.

10 And we'd had so many people running, you
11 know, 24 hours a day or 12-hour shifts or whatnot,
12 there was a lot of people dropping off, going home,
13 taking a couple days off. We were really understaffed.

14 And we had God knows how many people to
15 deal with, you know, and just a few CO's to take care
16 of them.

17 Q Well, if you could, I want you to describe
18 exactly how you were understaffed.

19 A Well, like in the booking department, we
20 might have, say, three people -- two or three people
21 trying to book in, you know, however many would come in
22 that day.

23 You've got to have people doing computer
24 entries. You've got to have a person doing NCIC,
25 running them through background checks and things.

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1 You've got to have somebody processing the person
2 physically, you know, taking their property inventory,
3 searching them out, doing all those things.

4 And we just -- you know, when you put five
5 or six people that all need to be done at the same
6 time, it's real hard to do.

7 Q Okay. So you said you had two or three

8 people in booking that day. We're talking about
9 September 4, 2005; right?

10 A Yeah.

11 Q Okay.

12 A Yeah.

13 Q How many -- if you were adequately staffed,
14 how many people would you need in booking?

15 A Five or six.

16 Q Okay. So you were running about half as
17 many as you would need then?

18 A Yeah. That was commonplace. I mean, we
19 were always pretty short-staffed, especially around
20 Katrina and afterwards.

21 Q You worked in booking for about two years?

22 A Yes, sir.

23 Q I want you to generally describe how
24 inmates are when they first arrive in booking.

25 A It really depends. Some of them -- you